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Subject: RE: May 18 Arkema Phone Call Decisions
Date: 05/21/2007 11:50 AM

Sean,

The following is a list of decisions reached during last Friday's DEQ/EPA teleconference regarding groundwater source control at the Arkema site. Please let me know if you have any changes to the summary.

Also, I am requesting a letter(s) from EPA that address EPA decisions 1, 5 and 7 below.

5/18/2007

Subject: Arkema Groundwater Source Control DEQ/EPA Teleconference

Participants:

Sean Sheldrake
Rene Fuentes
Dana Davoli
Chip Humphrey
Kristine Koch
Rose Longoria
Sheila Fleming
Erin Madden
Craig Christian
Tom Roick
Jim Anderson
Dana Bayuk
Henning Larsen

Decisions reached during the teleconference:

Rhone-Poulenc (RPAC) Groundwater Plume

1. EPA concluded that source control of the southern portion of the Rhone-Poulenc groundwater plume that crosses the Arkema site needs to be controlled on a schedule compatible with the Arkema Early Action.
2. DEQ will provide EPA and partners background RPAC project documents.
3. DEQ will inform RPAC of the need to accelerate source control measures to support the Arkema Early Action.
4. EPA - Contaminated sediments adjacent to Arkema Lots 1 and 2 represent principle threat material which should be addressed by Arkema. However, if this becomes problematic, EPA may pursue a new early action naming Arkema and RPAC.

5. EPA – EPA is currently scoping a Gasco/Siltronic early action. Accelerated source control of the RPAC groundwater plume north of Arkema Lots 1 and 2 will be necessary to support this early action.
6. DEQ agreed to reopen the groundwater source control schedule with RPAC for the portion of their plume north of Arkema Lots 1 and 2.

Arkema Groundwater Source Control

7. EPA clarified that for the purposes of the Arkema Early Action (USEPA/Arkema Removal Action Order, Removal Action Objective 6) EPA is using the DEQ/EPA Joint Source Control Strategy (JSCS) screening level values (SLVs) as preliminary remedial action objectives (RAOs) for the early action. Note, that the draft Gasco Early Action scope-of-work includes the same language, and it is EPA's expectation that JSCS SLVs would also be preliminary RAOs for this action.
8. EPA - Groundwater contaminant levels at Arkema that exceed JSCS SLVs (i.e., preliminary RAOs) need to be evaluated for source control in the groundwater source control feasibility study. A weight-of-evidence evaluation as used in the JSCS is not an option.
9. DEQ agreed to inform Arkema that the groundwater source control feasibility study needs to include:
 - active management of the monitoring well MW-63 area, which is currently located outside of Arkema's proposed groundwater containment system, and
 - active management of groundwater between the MW-63 area northward to the boundary of the RPAC plume unless additional site characterization shows this is not necessary.

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